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DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

August 9, 2013

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DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

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VIA FACSIMILE (609) 989-0451

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Helsinn Healthcare S.A., et. al. v. Dr. Reddy's Laboratories, Ltd., et al.
Civil Action No. 11-3962 (MLC)(DEA)

Dear Judge Arpert:

This firm, together with Paul Hastings LLP and Loeb & Loeb LLP, represents Plaintiffs Helsinn Healthcare S.A. and Roche Palo Alto LLC ("Plaintiffs") in the above-captioned matter.

In accordance with the parties' conversation with Your Honor during the August 5, 2013 conference call, enclosed is a proposed amended case schedule to which the parties have agreed. Per Your Honor's request, we have included blank spaces for Your Honor to input periodic telephone status conferences with the Court. If this meets with the Court's approval, we respectfully request that Your Honor sign the below form of endorsement and enter the schedule on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

William C. Baton

William C. Baton

cc: All Counsel (via e-mail)

SO ORDERED on this 16th day of August, 2013.

[Signature]
Hon. Douglas E. Arpert, U.S.M.J.

Helsinn Healthcare S.A. et al. v. Dr. Reddy's Laboratories, Ltd., et al.**Civ. No. 11-3962-MLC-DEA (D.N.J.)****Proposed Litigation Schedule for Remaining Events**

Event	Current Date	Proposed New Date
Plaintiffs' Responses to Amended Contentions	August 19, 2013 (Sandoz and Teva) August 22, 2013 (Reddy)	August 19, 2013
Opening expert reports (Issues for which party bears burden of proof)	July 12, 2013	September 9, 2013
Status teleconference with the Court		
Rebuttal expert reports	August 28, 2013	October 25, 2013
Reply expert reports	September 25, 2013	November 22, 2013
Close of expert discovery	November 20, 2013	January 17, 2014
Status teleconference with the Court		
Deadline to file dispositive motions ¹	December 17, 2013	January 31, 2014
Opposition briefs to dispositive motions	January 27, 2014	March 10, 2014
Reply briefs to dispositive motions	February 24, 2014	April 7, 2014
Status teleconference with the Court	October 21, 2013 January 8, 2014	@ 11:30 Am @ 11:30 Am

¹ The parties agree that any party wishing to file a motion for summary judgment prior to the close of expert discovery must seek prior written leave of court, and all parties reserve their right to oppose any such request for leave.